

Expansion of the London Ultra Low Emission Zone (ULEZ)

The consultation for the extension of the ULEZ from its current boundary inside the North and South Circular roads to cover the whole of greater London closed on Friday 29 July. It is now for TfL and the Mayor of London to examine the responses in detail before announcing whether the proposals will go ahead as planned on 29 August 2023 or whether they will be modified in any way. The proposals set minimum ULEZ emissions standards for 'light' vehicles, such as cars, motorcycles, vans and minibuses under 5 tonnes; coaches.

UKCOA online response to the Consultation submitted on 28 July 2022

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The UK Coach Operators Association (UKCOA), is a trade body run by coach operators for coach operators for the benefit of the coach industry and its clients. We currently have around 75 members from around the UK and are supported by a wide range of Industry Partners.

We generally support the introduction of the expanded ULEZ to cover the whole of London. Most of the vehicles operated by our members are already subject to the Low Emission Zone which covers the whole of London and therefore the only additional impact will be coaches and buses with under 22 seats, and support vehicles. We understand and support the general aims of the ULEZ to improve air quality in the capital.

There are a few points however that we wish to raise.

- We do not understand the reason why minibuses operated by Community Transport (CT) organisations are allowed a two year plus exemption from complying, which does not apply to bus and coach operators who may be making similar trips to those provided by CT. Some CT operators tender for work that is also open to other organisations. Allowing them to operate older vehicles, which do not comply with Euro VI standards, gives them an unfair advantage and seems to go against the whole concept of improving the quality of air in London. At the very least, this exception should be only permitted for local trips within the community, carrying specific categories of passengers, and not for more general trips, especially work that is subject to competitive tender. We would ask that TfL relooks at this specific exemption as it is currently proposed and reconsider their position.
- The coach industry is currently working with Zemo and other organisations as it moves along the road to zero carbon and, as already stated, we generally support the need to improve the quality of the air in London. However, at this present moment in time, there is not a robust solution for a long distance zero emission coach (or truck) and there are still many issues to overcome before one is likely to be in place. We would therefore urge caution before proceeding any further with the restriction of diesel engines and maintain engagement with the coach and logistics industry as we continue with our quest.

- In this respect it should be remembered that a Euro VI vehicle is incredibly clean compared to any of its predecessors, as there is a feeling within the industry that this tends to be forgotten by politicians and opinion formers. Coaches need to be viewed alongside buses as being part of the solution in bringing large numbers of people in one vehicle to London and not as a problem. We have already heard of proposals from local authorities to introduce zero emission zones by 2030, but this would effectively ban long distance coaches from entering those areas to the detriment of those using them.

We remain committed to improving the quality of the air in London and would be happy to discuss any part of our submission to this consultation with you. Please contact Peter Bradley, Managing Director of the UKCOA at info@uk-coa.co.uk.